

1 reviewing the test results asked for any data  
2 that would help substantiate past problems or  
3 ability to fix them and so forth, but we did not  
4 get any data on that.

5 Q Did you or any one of your members of the  
6 Anderson Consulting team review any of the issues  
7 lists that are maintained by AT&T and Ameritech  
8 that relate to issues that are arising in AT&T's  
9 use of the OSS?

10 A No. All those issues that you mentioned,  
11 the issue logs, bug logs, et cetera, the first I  
12 saw of those was in a supplemental data request.

13 Q Were you made aware of the fact that AT&T  
14 employees and Ameritech employees participated in  
15 daily conference calls to address problems that  
16 AT&T was having with the system?

17 A I was made aware of that.

18 Q Did you or any member of your team attempt  
19 to determine what those problems were?

20 A No. We asked what the -- what was -- you  
21 know, what was the purpose of it. And they said  
22 they were trying to work constructively to solve

1780

1 some of the reasons that orders were rejected but  
2 didn't have any documentation that they could  
3 produce to show us what it was.

4 Q Ameritech told you that it did not have  
5 any documentation that it could produce in  
6 connection with those daily conference calls?

7 A All I know is that there were daily or  
8 weekly conference calls, but I don't remember if  
9 I asked. I could check with my team, some of  
10 them are here today, if we asked that  
11 specifically.

12 Q Did you make any attempt to determine if  
13 the problems being discussed during those daily  
14 conference calls had been resolved to AT&T's  
15 satisfaction?

16 A Well, I got to admit, it seemed kind of  
17 funny on the rejects that some of the same  
18 reasons kept coming up over and over. We  
19 wondered if the conference calls were bearing  
20 fruit. But, you know, aside from some of the  
21 individual items that were mentioned in  
22 Mr. Connolly's testimony, it looks like some of

1       them have been kind of resolved. But it was kind  
2       of surprising to us just looking at it from one  
3       side of the fence that these issues weren't  
4       resolved more quickly.

5           Q   My question was more specific than that.

6                   In the course of your review leading  
7       up to your testimony, did you or any member of  
8       your team attempt to determine if the problems  
9       discussed during those daily conference calls had  
10      been resolved to AT&T's satisfaction?

11           A   No, we did not talk to any other carriers.

12           Q   Did you or any member of your team make  
13      any attempt at all to contact any of the CLECs  
14      that were using Ameritech's OSS to determine what  
15      their experience with the systems had been?

16           A   No, we did not.

17           Q   Did you make any attempt to determine if  
18      any CLECs had expressed any concerns or  
19      registered any problems regarding the use of the  
20      systems?

21           A   No. We talked about that at the beginning  
22      of the project with Ameritech but -- with

1 Mr. Rogers. And the response we got was that  
2 that might not be a worthwhile use of time  
3 because -- we kind of walked into this without  
4 knowing all the history, but apparently it was  
5 not a cordial relationship always. He thought  
6 given what we needed to do as far as reviewing  
7 testing and so forth, it would probably not be  
8 productive to try and talk to them. Based on  
9 some things we observed later, you know, he  
10 probably was right. But probably would have  
11 been -- shed a little more light on some of these  
12 topics.

13 Q Given your experience as a systems expert  
14 with Anderson Consultant, would you agree with me  
15 that it is important to talk to users of a system  
16 to determine if the system is, in fact,  
17 operational?

18 A In general, yes. This case has a number  
19 of unique circumstances that, you know, make it a  
20 little different.

21 Q So in this case, it's your opinion as a  
22 systems expert from Anderson Consulting that it

1 would not have been useful to talk to CLECs about  
2 their use of the systems?

3 A I think in this case since, you know -- in  
4 general, when Anderson Consulting designs a  
5 system for a client, we have users and we solicit  
6 their input during the system testing phase of  
7 the project.

8 In this case, you had a separate group  
9 that was building their own systems that could  
10 have had problems on their side of the fence as  
11 far as utilizing the interfaces. So we made a  
12 decision that we would look at the system once  
13 the orders and so forth made it into the  
14 operation support systems and try to ensure that,  
15 if received according to the Ameritech specs, it  
16 would process positively.

17 Q And did you make any effort to determine  
18 if CLECs like AT&T had any concerns about the way  
19 the orders were being processed internally at  
20 Ameritech?

21 A We did not talk to any CLECs.

22 Q Did you interview any Ameritech account

1        reps who interfaced directly with the CLECs to  
2        determine if they had any information or data  
3        about CLEC problems with the interfaces?

4            A    Only to the extent that some of the resale  
5        services guys, the project managers that helped  
6        develop those told us some of the issues that  
7        some of the CLECs had raised.

8            Q    And did you make any attempt to determine  
9        if those issues had been resolved?

10          A    Well, that was part of, you know, what  
11        went into the operations guides, that some of the  
12        those issues or questions they had were included  
13        then in the final product.

14          Q    Do you know if any one of the 34 member  
15        Anderson team talked to Bonnie Hemphill, the AT&T  
16        account manager for Ameritech?

17          A    I don't think.

18          Q    Now, as I understand your testimony, your  
19        team relied largely on testing that had been  
20        conducted; is that correct?

21          A    For the operational readiness, yes.

22          Q    All right. And having reviewed all the

1 materials that were produced in connection with  
2 your review, it would appear that you relied  
3 largely on the internal testing done by  
4 Ameritech. Is that an accurate assessment of the  
5 review?

6 A Yeah. In cases where their carriers  
7 weren't using the system, that's what we relied  
8 on.

9 Q In fact, as recently as last Friday, in  
10 your testimony you wrote that internal testing  
11 persuades you that the OSS systems will function  
12 properly; is that correct?

13 A I said -- I believe I said it provides  
14 some level of assurance that the systems would  
15 operate properly, yes.

16 Q Let me refer you to your testimony.

17 MS. SUNDERLAND: Looking for Page 7?

18 MS. MARSH: Page 7 of the rebuttal?

19 MS. SUNDERLAND: Hm-hmm.

20 BY MS. MARSH:

21 Q Yes. On Page 7, don't you indicate there  
22 that, Our review of the internal testing

1 persuades us that the OSS systems function  
2 properly as they were designed to do?

3 A Yes.

4 Q And don't you also indicate there that,  
5 After a system has been internally tested we do  
6 not typically see a significant volume of high  
7 priority errors; is that true?

8 A Hm-hmm.

9 Q And do you believe that statement is true  
10 in this case?

11 A That we will not see a high priority, high  
12 volume?

13 Q No. That after the time that the  
14 Ameritech systems have been proven satisfactory  
15 through internal testing, that Ameritech did not  
16 see a high volume of high priority errors.

17 A Well, in this case, since the CLECs are  
18 building their own systems and that was not  
19 included, you know, there could be errors that  
20 come through the system from the CLEC side,  
21 that's correct.

22 Q So do you believe that statement is true



1 in this case?

2 A I guess we would -- I could modify that to  
3 say we would not see a significant volume of high  
4 priority errors assuming that the orders are  
5 submitted in accordance with the Ameritech specs.

6 Q Now, isn't it true that internal testing  
7 done by Ameritech supported a conclusion that  
8 these systems were operationally ready as of  
9 January 2nd?

10 A I'm sorry. Could you repeat that.

11 Q Yes. Isn't it true that the internal  
12 testing performed by Ameritech supported a  
13 conclusion that the OSS systems were  
14 operationally ready as of January 2nd?

15 A You mean in prior hearings or testimony?

16 Q Did you review the affidavit that was  
17 submitted by Ameritech to the FCC when it filed  
18 for interLATA relief on January 2nd?

19 A No, I didn't.

20 Q Do you have any understanding or were you  
21 aware of the fact that Ameritech filed for  
22 interLATA relief on January 2nd?

1           A    I was aware they filed earlier.   I didn't  
2           know when.

3           Q    And would you agree with me that that  
4           affidavit or that filing was supported by an  
5           affidavit that the systems were operationally  
6           ready?

7           MS. SUNDERLAND:   I think he's already  
8           testified he doesn't know.

9           MS. MARSH:   Okay.

10          BY MS. MARSH:

11          Q    Would you agree with me that since January  
12          2nd, that many problems have indeed arisen in  
13          Ameritech's systems?

14          A    With respect to the OSS interfaces, which  
15          is what we looked at, there have been many  
16          rejected orders, that's correct.

17          Q    Other than rejected orders, would you  
18          agree that since January 2nd, there have been  
19          many problems that have been documented as it  
20          relates to Ameritech's OSS systems?

21          A    Depends on how you look at it.   I mean,  
22          through the interfaces, which is what we

1 reviewed, you know, that's what we reviewed.  
2 Down stream from that are the OSS, the legacy  
3 systems. And I don't know the extent or the  
4 number of problems that have been found in the  
5 down stream systems at all.

6 Q Let me hand you what was attached to  
7 Mr. Connolly's testimony as Exhibit No. 13. Did  
8 you have an opportunity to review that after  
9 Mr. Connolly made it available to you through his  
10 testimony?

11 A I saw this for the first time, I believe  
12 on, Sunday.

13 Q Doesn't -- in your supplemental rebuttal  
14 testimony, when was that filed, on last Friday?

15 A Right.

16 Q I believe you indicated you saw that log  
17 for the first time Sunday?

18 A I'm trying to remember. I was in Europe  
19 last week. Part of this was faxed to me when I  
20 was out of the country, but I didn't see the  
21 complete log, I think, until I got back..

22 Q And that was Sunday, two days ago Sunday?

1           A   Yeah.

2           Q   So prior to filing your supplemental  
3 rebuttal testimony, it's your testimony that you  
4 did not have an opportunity to review that log in  
5 its completion?

6           A   What's the date on this? 4/10. Yeah, not  
7 in its completion.

8           Q   Can you turn to your supplemental rebuttal  
9 testimony on Page 11. The question in the middle  
10 of the page indicates that in his testimony  
11 Mr. Connolly refers to certain Ameritech Illinois  
12 reports on order rejections including the log  
13 that you're holding. Have you reviewed those  
14 reports? And your answer is yes.

15          A   Right.

16          Q   Was that answer accurate as of last Friday  
17 when this testimony was filed?

18          A   Not in entirety. I had certain parts of  
19 this faxed to me. I discussed it with my team on  
20 the phone but did not personally go through this  
21 entire thing.

22          Q   But you now have had an opportunity to go

1 through that entire log; correct?

2 A You mean this log?

3 Q Yes.

4 A Yes.

5 Q Doesn't that log include a report or data  
6 on in excess of 400 system problems that  
7 Ameritech has experienced since January 2nd?

8 A Well, yeah. I didn't count them up, but  
9 that sounds about right.

10 Q And as I understand that log, Ameritech  
11 prioritizes the systems or the problems that it  
12 lists in it; is that correct?

13 A That's correct.

14 Q And do you know what a Priority 1 Problem  
15 according to Ameritech's code means in that log?

16 A Priority 1, in my understanding, is the  
17 most serious and it goes down from there.

18 Q And a Priority 1 Problem is identified by  
19 Ameritech as a customer impacting problem; is  
20 that correct?

21 A I believe so.

22 Q Can you tell me how many Priority 1

1 problems have been identified by Ameritech since  
2 January 2nd?

3 A Excuse me. What is the date? I can't  
4 read the date on this because -- the reason I'm  
5 confused is because the report --

6 Q The report was actually run and produced  
7 on April 10th which is the date up in the corner,  
8 but the log tracks problems at the beginning of  
9 the year.

10 A Right. Okay. I'm getting confused  
11 because this had the same title as the report I  
12 reviewed which is the order testing problem log,  
13 and it was dated as of a later date. I don't  
14 recall if it was like late April or early May.

15 Q Well, it's very possible that Ameritech  
16 may have sent you a more recent version. This is  
17 the only version that --

18 A Right. That's why I was confused that  
19 this was this big. I thought I only saw part of  
20 it. I think I saw the whole thing of the more  
21 current version.

22 And at that time, I had not seen this

1 one that showed -- I saw one that showed the open  
2 issues or open problems as of late April, early  
3 May. And I believe there was 45 problems on it  
4 at that time.

5 Q Okay. I'm not sure what document you're  
6 referring to. This document was attached to  
7 Mr. Connolly's testimony and it's the one that I  
8 wanted to -- have you reviewed this document?

9 A Right. I was just going off the title  
10 here. I reviewed the report, this report. I  
11 read the title. And I saw a later version of the  
12 report with this title.

13 Q Okay. I don't remember what my question  
14 was. Let me start again.

15 A About the numbering.

16 Q Can you tell me how many number --  
17 Priority 1 problems Ameritech has experienced  
18 with its systems since January 2nd, 1997?

19 A The report I saw which was the open ones  
20 as of a week ago didn't have any, but there are  
21 some in here as I page through it.

22 Q Yes. As a matter of fact, there are.

1 They're in excess of -- I think there are  
2 approximately 15 in here.

3 Did you or any member of your team  
4 make any effort to determine that the Priority 1  
5 problems listed on this log have been resolved?

6 A Well, again, given that we saw a log, a  
7 more recent version of this with no Priority 1  
8 problems, I can only assume they were resolved or  
9 they'd be on the more recent log.

10 Q Then as to this version that was attached  
11 to Mr. Connolly's testimony, is it now your  
12 testimony that you have not reviewed this  
13 document?

14 A Yeah. I reviewed the order testing  
15 problem log, different date, that's correct.

16 Q And it only had open issues on it?

17 A Yeah. To my under- -- I remember seeing  
18 two; one that said open issues and one that said  
19 closed issues.

20 Q So then I just want to be clear on this.  
21 This version that was attached to Mr. Connolly's  
22 testimony you have not reviewed; is that correct?



1           A   That's right. I was sent a copy of it.  
2   That was a more recent version, but it's not the  
3   exact same one.

4           Q   How about the AIIS testing problem log  
5   that was attached to Mr. Connolly's testimony,  
6   have you had an opportunity to review that?

7           A   Yeah. The other logs I have had a chance  
8   to review.

9           Q   All right. Of the numerous logs that were  
10   attached to Mr. Connolly's testimony, did you  
11   have any opportunity or did any member of your  
12   team have an opportunity to determine if the  
13   problems issued -- I'm sorry, the problems  
14   reported on those logs have been resolved?

15          A   No. We saw the reports about a week ago.  
16   And since that time, all we've looked at is the  
17   status. We have not looked to see if they've  
18   been resolved. We know what's open. So we know  
19   what has been closed since the initial version of  
20   the report.

21          Q   Let me refer you again to your testimony,  
22   your supplemental rebuttal testimony, Page 11.

1 Again, the question in the middle of the page  
2 says, In his testimony, Mr. Connolly refers to  
3 certain Ameritech Illinois reports on order  
4 rejections such as this order testing problem  
5 log, the AIIS testing problem log, the telesphere  
6 log, the resell bugs not fixed log, and the  
7 issues general log. Have you reviewed these  
8 reports? And your answer is yes. Is that answer  
9 accurate or not?

10 A Yes. I already answered that, I think.

11 Q The next question says, Does the  
12 information contained on these reports affect  
13 your conclusion that Ameritech Illinois' systems  
14 are operational ready? And your answer to that  
15 is no.

16 A That's right.

17 Q And now I'm understanding you have not  
18 even reviewed the order testing problem log as  
19 attached to Mr. Connolly's testimony; is that  
20 correct?

21 MS. SUNDERLAND: Excuse me. I think his  
22 testimony is clear that he reviewed a more -- a

1 later vintage of that.

2 MS. MARSH: He said only with closed problems  
3 on that which would --

4 THE WITNESS: No, no. Let me --

5 MS. SUNDERLAND: No, he said he saw both.

6 THE WITNESS: Let me explain.

7 JUDGE GUERRA: One at a time.

8 THE WITNESS: Let me explain. There's two  
9 logs, an open issues and a closed, I believe it  
10 is called.

11 We reviewed the open issues as of  
12 whatever the date was a few days ago, middle of  
13 last week, the severity and number of logs. And  
14 I can produce that somewhere. We have it in the  
15 room here. There was 45, I believe, open issues  
16 still.

17 Out of those 45, there was no Severity  
18 1 errors on those. And given when I look at a  
19 complex system such as this, it's not uncommon to  
20 have several hundred bugs open in a system even  
21 after it goes into production.

22 So based on the fact that there was 45

1 and that none of them were Severity 1, it did not  
2 affect my opinion with respect to the readiness  
3 conclusion that we have reached earlier. That's  
4 all.

5 BY MS. MARSH:

6 Q And I think you also indicated that you  
7 reviewed a log that had closed issues on it;  
8 correct?

9 A Yes.

10 Q Did anybody on your team make any effort  
11 to determine what work had been done by Ameritech  
12 to close those issues?

13 A No. We had to go off the log.

14 Q Did anybody on your team make any effort  
15 to verify that those issues had indeed been  
16 resolved as Ameritech said they had been  
17 resolved?

18 A No. We did not see any rejections for  
19 those reasons coming across on the production,  
20 but we did not verify that someone went in and  
21 changed code to fix it.

22 Q Well, let's talk about some of the

1 individual problems so we can understand what  
2 work you did in connection with them.

3 Do you know what an 865 is,  
4 Mr. Meixner?

5 A That's, I believe, the order completion.

6 Q And do you know when the Ameritech systems  
7 generate or are supposed to generate 865s?

8 A I assume after an order completes.

9 Q How soon after an order completes?

10 A I don't know. We looked at the interfaces  
11 and the 865s come out of the legacy systems. So  
12 I really didn't follow that through to  
13 completion. I don't know the time frame.

14 Q Is it your testimony that Anderson  
15 Consulting did not look at the performance of the  
16 underlying legacy systems in connection with  
17 Ameritech's OSS offering?

18 A That's correct.

19 Q Do you think that it is appropriate to  
20 render a decision or an opinion as to operational  
21 readiness of these systems without having  
22 reviewed the performance of the legacy systems?

1           A   Well, yes, if your opinion is on the  
2 interfaces.

3           Q   So if I understand the scope of your  
4 opinion, it's only on the link directly between a  
5 CLEC and Ameritech, it is not on how the  
6 underlying systems perform?

7           A   Not the back end legacy systems. Once it  
8 goes through the system, my understanding is that  
9 it takes the same transaction path as an  
10 Ameritech retail system. But we did not look  
11 further down stream to see if there were any  
12 differences or if there were any other changes.

13          Q   If there were problems with the  
14 underlying -- the operation of the underlying  
15 legacy systems that were impacting the way in  
16 which CLEC orders were being processed, would  
17 that affect your opinion on operational  
18 readiness?

19          A   Well, again, the opinion was only based on  
20 the interfaces. But if you're looking at end to  
21 end type of integration, I suppose it could be based  
22 on these logs which included, I believe, problems

1 both with the interfaces and the downstream  
2 legacy systems.

3 I didn't see anything again of the  
4 most recent version that would jump out at me and  
5 say, hey, there's a big problem here, but I did  
6 not review those systems.

7 Q Did you review the testimony that was  
8 provided by the Ameritech witness at the  
9 Wisconsin proceeding?

10 A Joe Rogers?

11 Q Yes.

12 A I think I read it, yes.

13 Q Are you aware of the fact that after a  
14 discussion of these problems, system problems,  
15 Mr. Rogers concluded that the systems were not at  
16 that time operational ready?

17 A I think I saw that in the transcript. And  
18 I think later didn't he change, you know --  
19 say --

20 MS. SUNDERLAND: I'm going to object to  
21 asking Mr. Meixner to have an opinion on  
22 something Mr. Rogers said. Mr. Rogers will be

1       here.

2           MS. MARSH:  It's appropriate for this expert  
3       to review testimony from Ameritech witnesses and  
4       rendering opinions and that was sworn testimony  
5       which is now in --

6           MS. SUNDERLAND:  And you have not yet  
7       demonstrated it has anything to do with the  
8       interfaces.

9           MS. MARSH:  It has everything to do with  
10      operational readiness.

11          MS. SUNDERLAND:  But we're making a  
12      distinction here between the interfaces and the  
13      systems.  She has not established the question  
14      she is asking is related to the opinion that  
15      Mr. Meixner is rendering.

16          JUDGE GUERRA:  Read the question back.

17                               (Record read as requested.)

18          JUDGE GUERRA:  What is your objection?

19          MS. SUNDERLAND:  My objection is that I think  
20      Ms. Marsh, when she talks about operational  
21      readiness, is talking about, you know, an end to  
22      end operational readiness for the systems.



1 I think Mr. Meixner has tried to  
2 explain that the work that his team did was  
3 focused on one part of that end to end  
4 relationship. His team focused on the interfaces  
5 themselves.

6 And whatever Mr. Rogers said in  
7 Wisconsin may or may not have been related to the  
8 interfaces. It may have been related to legacy  
9 systems, to downstream issues. And I think it's  
10 fundamentally --

11 JUDGE GUERRA: Objection is sustained. If  
12 you can reword it or lay a better foundation.  
13 BY MS. MARSH:

14 Q Do you know if the opinions rendered by  
15 Mr. Rogers in Wisconsin relate to just the  
16 interfaces or the function of the system itself?

17 A I don't know. I don't remember the  
18 testimony.

19 Q Can you tell me -- strike that.

20 JUDGE GUERRA: Let's go off the record for a  
21 second.

22 (Discussion off the record.)